



U.S. Department of Justice

United States Attorney
Southern District of New York

The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007

February 18, 2020

BY ECF

The Honorable Lewis J. Liman
United States District Judge
Southern District of New York
500 Pearl Street
New York, New York 10007

The Honorable Loretta A. Preska
United States District Judge
Southern District of New York
500 Pearl Street
New York, New York 10007

**Re: *United States v. Daniel Daniel*, 20 Cr. 101 (LJL)
 United States v. Razhden Shulaya, et al., 17 Cr. 350 (LAP)**

Dear Judge Liman and Judge Preska:

The Government respectfully submits this letter in connection with the above-referenced indictments and to inform the Court as to the factual overlap between the two cases. The indictment in *United States v. Daniel Daniel*, 20 Cr. 101 (LJL) (the “Daniel Indictment”) was returned unsealed on February 4, 2020. Thereafter, the Government sought to unseal the underlying complaint, 19 Mag. 10068 (the “Daniel Complaint”). As detailed below, the facts underlying the Daniel Complaint overlap with the investigation, alleged criminal activities, and ultimately a trial concerning the Shulaya Enterprise that was the subject of *United States v. Razhden Shulaya, et al.*, 17 Cr. 350 (LAP).

Both of the above-captioned cases arises from the investigative efforts of the FBI centering on the activities of the “Shulaya Enterprise,” as described in the original Indictment filed in *Shulaya* (the “Shulaya Indictment”) and as referenced in the Daniel Complaint. Since in or about June 2014, the FBI has been investigating the Shulaya Enterprise, which, as alleged in the Shulaya Indictment, is an organized criminal group operating in the Southern District of New York and elsewhere. As alleged, the Shulaya Enterprise pursues a broad spectrum of criminal activity. Among other things, the Shulaya Enterprise has transported and sold stolen property (including contraband cigarettes), run an illegal gambling parlor, extorted debtors to its gambling operations, laundered criminal proceeds, planned to rig slot machines to defraud casinos, and engaged in plots to commit robbery and assaults. As further described in the Shulaya Indictment, this investigation

was conducted in part through the cooperation of several confidential sources with varying levels of access to the inner-workings of the Shulaya Enterprise.

The Daniel Indictment relates to the Shulaya Indictment in that the object of the money laundering conspiracy charged in the Daniel Indictment is the laundering of the proceeds of various criminal activities by Razhden Shulaya and the Shulaya Enterprise. Shulaya is an undindicted co-conspirator in the Daniel Indictment, and his activities and those of the Shulaya Enterprise would form a necessary part of the evidence if the Daniel Indictment were to proceed to trial.

Currently, no defendants in the *Shulaya* case are pending trial. One defendant, Bakai Marat-Uulu, has recently filed a petition for relief pursuant to 28 U.S.C. § 2255, and another, Mamuka Chaganava, became a fugitive following his guilty plea in mid-2018.

Respectfully submitted,

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cc: All Counsel (by ECF)